

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

TRINITY VALLEY SCHOOL, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
CHESAPEAKE OPERATING, INC.,	§	Civil Action No. 3:13-cv-01082-K
CHESAPEAKE EXPLORATION,	§	
L.L.C. as successor by merger to	§	
CHESAPEAKE EXPLORATION, L.P.,	§	
	§	
Defendants.	§	

JOINT SUBMISSION REGARDING SETTLEMENT CONFERENCE

TO THE HONORABLE JUDGE ED KINKEADE:

Plaintiffs Trinity Valley School, et al. (“Plaintiffs”) and Defendants Chesapeake Operating, Inc. n/k/a Chesapeake Operating, L.L.C., and Chesapeake Exploration, L.L.C. (“the Chesapeake Defendants”) submit the following report as directed by the Court in its Second Amended Scheduling Order, dated November 4, 2014, regarding whether meaningful progress towards settlement was made, and the prospects of settlement.

On August 21, 2014, the parties met in person for a settlement conference before the Honorable Paul D. Stickney, United States Magistrate Judge.

For the Plaintiffs, their counsel Daniel Charest attended, along with Frank McCreight, Senior Vice President of BOPCO, LP on behalf of the Bass interest (and with full settlement authority for all absent plaintiffs), and Paul McKinney, Mary Swift, and Bill Bredthauer on behalf the McKinney Plaintiffs.

For the Chesapeake Defendants, their counsel Chris Sileo, Bryan Lauer, and Joe Kendall attended, along with the Chesapeake Defendants' representatives Pete Vermillion (Chesapeake In-House Counsel), Deven Bowles (Revenue Accounting Manager) and Hugh Brower (Land Supervisor – Central Texas/Barnett Shale).

During the settlement conference, the parties conducted settlement negotiations. Several offers and demands were exchanged, and some progress toward settlement was made, but the parties were unable to settle, and the prospects for settlement as of the close of the settlement conference appeared to be low, given the difference between the parties' positions on certain issues.

The parties continue to discuss settlement. On August 28, 2015, the parties participated in a status call regarding settlement with Judge Stickney and have agreed to further discuss settlement over the next several days and then convene a follow-up telephone conference with Judge Stickney on Wednesday, September 2, 2015 at 10:00 a.m.

Respectfully submitted,

/s/ Daniel H. Charest

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Respectfully submitted,

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EXPLORATION, L.L.C.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on Plaintiffs on the 28th day of August, 2015:

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